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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Elvia Daneette Marez,
Plaintiff,

vs.

Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

Case No 1:22-cv-01354-SKO

ORDER GRANTING
STIPULATION AND UNOPPOSED
MOTION FOR EXTENSION OF
TIME

(Doc. 13)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from April 10, 2023 to June 9, 2023, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for the requested extension. For the weeks of April 10, 2023 and April 17, 2023, Counsel currently has 13 merit briefs, and a reply brief. This includes cases

1 that undersigned counsel took on during co-counsel's, Dolly M. Trompeter, leave
2 of absence. Additional time is needed to thoroughly brief this matter for the Court.

3 Counsel for Plaintiff is currently taking partial leave as his child was born on
4 October 14, 2022. Thus, Counsel is working limited hours.

5 Additionally, Counsel underwent major surgery on March 15, 2023,
6 requiring post-op physical therapy, with the need for several breaks throughout the
7 workday.

8 Defendant does not oppose the requested extension. Counsel apologizes to
9 the Defendant and Court for any inconvenience this may cause.

10
11
12 Respectfully submitted,

13 Dated: April 2, 2023

PENA & BROMBERG, ATTORNEYS AT LAW

15 By: /s/ Jonathan Omar Pena
16 JONATHAN OMAR PENA
17 Attorneys for Plaintiff

18
19 Dated: April 2, 2023

20 PHILLIP A. TALBERT
21 United States Attorney
22 MATHEW W. PILE
23 Associate General Counsel
24 Office of Program Litigation
25 Social Security Administration

26 By: */s/Edmund J. Darcher
27 Edmund J. Darcher
28 Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on March 31, 2023)

ORDER

Pursuant to the parties' stipulation and unopposed motion for an extension of time (Doc. 13), IT IS HEREBY ORDERED that Plaintiff shall have an extension, up to and including June 9, 2023, to file Plaintiff's Motion for Summary Judgment. The deadlines in the Scheduling Order (Doc. 5) are hereby extended accordingly.

IT IS SO ORDERED.

Dated: **April 3, 2023**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE